

**FINDING OF POTENTIAL SIGNIFICANT IMPACT
AND REFERRAL TO
FURTHER ENVIRONMENTAL ANALYSIS
FOR THE
EA# ID120-2007-EA-1**

FINDING OF POTENTIAL SIGNIFICANT IMPACT

Based on the findings documented in Environmental Assessment ID120-2007-EA-1, implementation of the Proposed Action may significantly affect the quality of the human environment. Therefore, further environmental analysis in the form of an Environmental Impact Statement (EIS) is required.

I base my findings on the following:

1. Impacts that may be both beneficial and adverse.

The environmental assessment did not consider all of the beneficial and adverse impacts of the proposed action. The EA focused on the specific impact to bighorn sheep relative to the risk and impacts of physical contact between domestic sheep and bighorn sheep and found that a significant risk of adverse impacts to a federally sensitive species, the California bighorn sheep exists. Further analysis in a more extensive environmental analysis in the form of an EIS is required. Other impacts (e.g. weeds & grazing utilization differences between bovines and ovines) would need to be analyzed in that document.

2. The degree to which the proposed action affects public health or safety.

The potential affects to public health and safety were not addressed. Further analysis in a more extensive environmental study, as is indicated by other sections in this document, would have to be accomplished to determine those affects.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

No analysis was accomplished at this time on the effects on any unique characteristics. Further analysis in a more extensive environmental study, as is indicated by other sections in this document, would have to be accomplished to determine those affects.

4. The degree to which the effects on the quality of the human environment is likely to be highly controversial.

Public comments, while numerous in comparison with other EAs commented upon by the public, were local in origination and it appears were mostly from an organized letter writing campaign from a Big Horn Sheep advocacy group. The apparent degree of interest was no more than normal for this type of action.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The degree of possible effects on the human environment is highly uncertain and contains significant unknown risks. BLM Instruction Memorandum # 98-140 recommends buffer strips up to 9 miles. Because of their wide-ranging nature, the habitat lines for bighorn sheep are approximations and, as a result, the buffer distances required to prevent contact is uncertain. Additionally, while many studies suggest that catastrophic die-offs of bighorn sheep are the result disease transmission from the physical contact between domestic and bighorn sheep, some contend that those diseases may not be the cause of the die-offs.

6. The degree to which the action may establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration.

The actions and practices analyzed in the EA may set precedents concerning the authorization of domestic sheep grazing in areas that may impact bighorn sheep populations. Because of the potentially precedent setting decision, additional environmental analysis and extensive scoping is required.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

This EA considered potential cumulative impacts of the Proposed Action and concluded that implementation may cause significant cumulative effects on biological, cultural, or social resources, especially when considered in relation to other actions.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historical resources.

Based on the analysis documented in the EA, the proposed action has the potential to cause loss or destruction of significant scientific resources. Potential loss of the Shoofly, Little Jacks and Big Jacks Creek herds could significantly impact the diversity of the bighorn sheep herds in southern Idaho. Further extensive environmental analysis in the form of an EIS would be required to fully understand the degree of impact to the scientific resources affected by the loss of these herds.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.


One BLM sensitive species, the California bighorn sheep, is known to occur within the immediate area of public lands affected by the proposed action. There is a significant risk that these bighorn sheep could come into physical contact with domestic sheep if domestic sheep were authorized to graze in the region. Additionally, many studies suggest that even limited contact between the two species result in disease transmission. While there are dissenting viewpoints that there may not be a risk of sufficient physical contact to transmit disease under range conditions, these viewpoints are not supported by conclusive or definitive studies and the authors still acknowledge the potential for disease transmission. Broad-based evidence presented in the EA indicates that there is a high degree of likelihood that the proposed action would adversely affect bighorn sheep. Further extensive environmental analysis in the form of an EIS would be required to fully understand the potentially adverse affects.

10. Whether the action threatens a violation of Federal, State, or local law for requirements imposed for protection of the environment.

The proposed action may violate regulations of Federal, State, and local laws for the protection of the environment. Even using the assumption that the potential for physical contact between bighorn sheep and domestic sheep is remote, the potential for catastrophic consequences in the form of a massive die off of the bighorn sheep herds in the immediate area remains. The requirement to take "extraordinary actions to protect a sensitive species" as delineated in BLM Instruction memorandum 98-140 indicates that a more complete and extensive environmental analysis in the form of an EIS would be needed to quantify the potential for contact between domestic and bighorn sheep and likelihood for catastrophic consequences.

Signatures

Approved by: _____


Mitchell A. Laurena, Bruneau Field Office Manager

Date: _____

12 June 2007